

Dear Board Members:

The Utah Physicians for a Healthy Environment appreciate the willingness of the board to consider the health issues raised in our May presentation. We are grateful that the board is embarking on a review of the health-related evidence for stricter standards and want to help define a path to improved public health through air quality initiatives. This will be a difficult process, and we want to offer some suggestions that may facilitate matters and help the board's review succeed in the eyes of the public.

Extensive work on the health-based air quality standards has been done at the national and international level over many decades, as reviewed recently by John Bachman in the Journal of the Air & Waste Management Association. In nearly every case the numerical limits and form of the standard have been controversial. A comprehensive Utah-level review of all health related air pollution issues would be overwhelming. In our opinion the expert panel review should focus on the conclusions of recent federal Clean Air Science Advisory Committee reports, new studies published subsequent to the CASAC review, existing standards set by agencies other than the USEPA, and Utah-specific circumstances. Our current issue of concern is straightforward. We believe that current epidemiological evidence fully supports lowering the thresholds at which public alerts regarding PM_{2.5} and ozone are issued. Lower thresholds for alerts are consistent with providing a margin of safety when faced with uncertainty.

Since our concern regards the criteria and content for official State of Utah communications regarding health impacts of air quality we strongly recommend that the expert panel consist of health scientists with expertise in epidemiology, toxicology, pediatrics, pulmonary and cardiovascular medicine, and public health. Initial development of improved air quality alerts can be done in a structured but informal stakeholder process, but the credibility of the alerts will be enhanced if they are ultimately based on criteria approved through normal Air Quality Board rulemaking. In parallel with the expert panel review UPHE would welcome ongoing informal discussions with Division of Air Quality staff and other stakeholders to exchange information on health-related issues and explore ways to collaborate in improving air quality. We hope both processes would begin in the next few weeks.

Sincerely,
Dr. Brian Moench
President, UPHE